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May 31 2024

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
The Honorable Michael S. Holt, PCR Judge
The Honorable W. Jeffery Young., Circuit Judge

Appellate Case No. 2023–001205

Demetrius A. Goodwin, SCDC #345308,

Petitioner,

v.

State Of South Carolina,

Respondent.

**MOTION FOR A FOURTH EXTENSION OF TIME TO SERVE AND FILE THE
RETURN TO PETITION FOR A WRIT OF CERTIORARI**

Counsel for Respondent respectfully moves for a **fourth** and **final** extension of ten (10) days in which to serve and file the Return to Petition for Writ of Certiorari in this case. This is a fourth request for an extension. In support of this request, counsel shows:¹:

1. The Return to Petition for a Writ of Certiorari is due to be served and filed with the Court today, May 31, 2024.
2. Counsel for Respondent respectfully submits that extraordinary circumstances exist that warrant the granting of an additional time extension. Given the number of extensions

¹ In compliance with: In Re: Extensions in Criminal and Post-Conviction Relief Cases, (S.C. Sup. Ct. order dated March 18, 2009) (Davis Adv. Sh. No. 13 at 1).

previously granted and the order in which counsel attempts to manage his heavy caseload, Counsel hopes that no further extension requests will be required.

3. Counsel had a term of court on April 8 – 12, 2024, in the Tenth Judicial Circuit, in which Counsel is preparing orders.
4. Counsel had a term of court on May 20 – 24, 2024, in the Seventh Judicial Circuit.
5. Counsel had a term of court on May 27 31, 2024, in the Fifth Judicial Circuit, in which Counsel just finished hearings on today.
6. In the last month, Counsel has had multiple PCR filings due with the lower courts in the Fourth, Fifth, Sixth, Seventh, and Twelfth Judicial Circuits.
7. This extension request is made in good faith and not intended for delay, but rather due to counsel's heavy workload and to ensure the return is properly researched and prepared.
8. Opposing counsel has graciously consented to this request via interagency agreement.

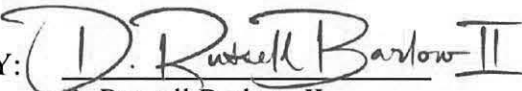
WHEREFORE, the undersigned counsel would respectfully request a ten-day extension in which to serve and file the Return to Petition for Writ of Certiorari in this case based upon the above exigent circumstances.

|SIGNATURE PAGE FOLLOWS|

Respectfully submitted,

ALAN WILSON
Attorney General

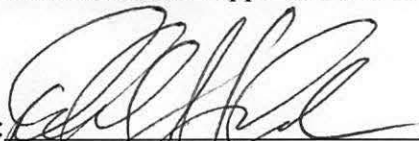
D. RUSSELL BARLOW, II
Assistant Attorney General

BY: 

D. Russell Barlow, II
S.C. Bar No. 105228
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3737

ATTORNEYS FOR RESPONDENT

I have reviewed and approved this extension request.

By: 
Donald J. Zelenka
Deputy Attorney General

May 31, 2024